

May 9, 2022

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Mr. Brian Conrath
National Priorities List Unit
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Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
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**Subject: Former Mid-States Industrial Property – Summary of Historical Data
2401 11th Street, Rockford, Illinois 61108**

Dear Ms. Knoepfle and Mr. Conrath:

On behalf of Hamilton Sundstrand Corporation (HSC), AECOM Technical Services Inc. (AECOM) is providing this summary of historical data regarding the former Mid-States Industrial property located at 2401 11th Street, Rockford, Illinois.

The purpose of this letter is to provide United States Environmental Protection Agency (EPA) and Illinois Environmental Protection Agency (Illinois EPA) a summary of the information obtained through a Freedom of Information Act request submitted to EPA/IEPA on August 3, 2021 and reviewed by AECOM regarding leachate impacts directly upgradient of the HSC Plant 1/2 Facility in Rockford, Illinois.

The attached figure shows the locations of potential soil source areas and leachate contaminant concentration data on and in the vicinity of the former Mid-States Industrial property. The following includes summaries of information obtained from various documents and is based on AECOM's initial review of historical records regarding the former Mid-States Industrial property.

- 1) Vapor Degreaser and Drum Storage Area:
Waste (trichloroethene [TCE], Stoddard Solvent, Waste Oil) was noted to be improperly stored resulting Illinois EPA to consider the site to be an unpermitted Resource Conservation and Recovery Act (RCRA) storage unit requiring RCRA closure plan.

Source: June 22, 1988, RCRA Facility Inspection

- 2) Phase 1 Sampling and Analytical Report:
Summary of two rounds (8/19/88 borings [B1-B5] and 1/3/89 borings [B3-B9]) of shallow soil borings advanced in the drum storage area and the runoff area. TCE was detected at 67,000 micrograms per kilogram (ug/kg) (16 to 20 inches below ground surface [bgs]) in the drum storage area. The report noted that future samples would be analyzed for TCE only to minimize sampling costs.
Source: Fehr-Graham & Associates. 1989. *Phase 1 Sampling and Analytical Report for Drum Storage Area Closure*. February 28, 1989.
- 3) Phase 2 borings:
The report documented that additional borings, B10-B19, were advanced on 2/28/89. During the week of 9/5/89, 35 samples were collected from a grid pattern around drum storage area to depths of 10 feet bgs and two locations from within footprint of drum storage area. On 10/6/89, an additional 6 borings were advanced across the remainder of the property.
Source: Fehr-Graham & Associates. 1990. *Final Closure Recommendation for the Rockford Power Site*. August 29, 1990.
- 4) 1992 Illinois EPA letter:
Illinois EPA stated in this letter that the RCRA closure plan was denied. The reasons for denial included: horizontal and vertical extent of contamination had not been defined; and sampling methods conducted in the runoff area did not follow appropriate procedures for volatile chemicals in soil. The letter stated that additional sampling was required and that remediation of the groundwater at the site must be addressed.
Source: July 8, 1992, IEPA Letter to Mid-States Industrial Corporation.
- 5) 1998 Preliminary Assessment:
The assessment stated that RCRA closure would be required for the Former Drum Storage Area (SWMU 1) and Runoff Area (AOC A) given that no remediation had taken place, to date. The assessment also stated that nature and extent of contamination had not been established. The assessment references an internal Illinois EPA memo that the site would be enrolled into the superfund program.
Source: Techlaw, Inc. 1998. *Preliminary Assessment/Visual Site Inspection Report*. April 10, 1998
- 6) Historical and current groundwater flow direction near SMW19 (HSC monitoring well), has demonstrated that the former Mid-States Industrial property (formerly Rockford Power Machinery) is directly hydraulically upgradient of the HSC property, and is located within Source Area 9/10 and was identified as a potential source in the 2002 Operable Unit Number 3 (OU3) Record of Decision (ROD) (see page 29 of the OU3 ROD).
- 7) Soil concentrations that exceed the Illinois EPA soil-to-groundwater migration pathway criteria and leachate concentrations in excess of the OU3 ROD remedial action objective (RAO) #3 are documented in the historical data on the Mid-States Industrial property. The primary constituent of concern for the Mid-States Industrial property is TCE.

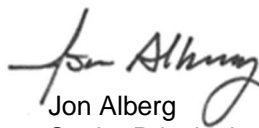
This summary of historical data is not meant to be a comprehensive review but rather preliminary findings to aid in future discussions with EPA and Illinois EPA regarding leachate impacts upgradient of the HSC Plant 1/2 facility.

Please contact either of the undersigned with any questions you may have.

Prepared by:



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Attachments

Figure 1 – Former Mid-States Industrial Property Summary of Historical Data

cc: John Wolski, Raytheon Technologies Corporation

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